

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WILLIAM HEMMINGS,

Plaintiff,

vs.

Case No. 18-CV-2036

Judge Alonso

INSYS THERAPEUTICS, INC., a  
Delaware corporation,

Magistrate Judge Gilbert

Defendant.

**PLAINTIFF'S PROPOSED DISCOVERY PLAN**

Plaintiff, William Hemmings, by and through his undersigned counsel, respectfully provides Magistrate Judge with the following proposed Discovery Plan in advance of the parties' December 19, 2018 status conference with Magistrate Judge Gilbert:

- A. Plaintiff proposes that Defendant be Ordered to complete its document production on or before January 15, 2019.
- B. Plaintiff proposes to take the following depositions, beginning in late January or early February: 1) Nick Patel; 2) Hussein Bahamou; 3) Darin Engelhart; 4) Gina McCreary; 5) Alan Burlakoff; 6) John Kapoor; 7) Michael Babich; 8) Jim Coffman; 9) Brian Pipko; 10) Robin Wachsman.

Additional depositions as necessary and to be determined based upon the foregoing deposition testimony.

**RESPECTFULLY SUBMITTED,**

**By: s/Michael I. Leonard**  
**Counsel for Mr. Hemmings**

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**CERTIFICATE OF SERVICE**

The undersigned states that, on December 17, 2018, he caused the above document to be served upon opposing counsel of record by way of ECF filing it.

**By: s/ Michael I. Leonard**